INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

October 2, 2003

TO: Interested Parties / Applicant

RE: Erler Industries, Inc. / T079-17195-00010

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Erler Industries, Inc.

418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and
125 West Hayden Pike, North Vernon, Indiana 47265

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T079-17195-00010	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 2, 2003 Expiration Date: October 2, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary surface coating operation that spray paints plastic and metal parts.

Responsible Official:	Mark Erler, President
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265 71 Hayden Pike, North Vernon, Indiana 47265 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address:	P.O. Box 219, North Vernon, Indiana 47265
General Source Phone Number:	(812) 346-4421
SIC Code:	3479, 3663
County Location:	Jennings
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This surface coating company that spray paints plastic and metal parts consists of five (5) plants:

(a) Plant 1 is located at 418 Stockwell Street, North Vernon, Indiana 47265;

(b) Plant 2 is located at 71 Hayden Pike, North Vernon, Indiana 47265

(c) Plant 3 is located at 125 West Hayden Pike, North Vernon, Indiana 47265;

(d) Plant 4 is located at 125 West Hayden Pike, North Vernon, Indiana 47265; and

(e) Plant 5 is located at 125 West Hayden Pike, North Vernon, Indiana 47265.

Since the five (5) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of Minor Source Modification T079-16570-00010, issued on February 12, 2003.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Located in Plant 1:

(1) One (1) surface coating line, identified as Line 1, installed January 18, 1991, consisting of:

(A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of 327 parts per hour, each equipped with dry filters

to control particulate overspray, exhausting to stacks S/V1 and S/V2; and

(B) Two (2) robot paint booths, installed December 15, 2000, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of 327 parts per hour, each equipped with dry filters to control particulate overspray.

(2) One (1) surface coating line, identified as Line 2, installed January 18, 1991, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes High Volume Low Pressure (HVLP), air atomized and electrostatic paint guns.

(b) Located in Plant 2:

(1) One (1) surface coating line, identified as Line A, installed March 29, 1996, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped with two (2) High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.

(2) One (1) surface coating line, identified as Line B, installed March 29, 1996, consisting of:

(A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and

(B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

(c) Located in Plant 3: One (1) surface coating line, identified as Line 3, installed September 27, 1999, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, with a total maximum capacity of 437 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V13, S/V14, and S/V15, respectively.

(d) Located in Plant 4: One (1) surface coating line, identified as Line 4, installed September 5, 2002, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, with a total maximum capacity of 625 parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns, controlled by fabric filters, exhausting to stacks S/V19, S/V20, and S/V21, respectively.

(e) Located in Plant 5: One (1) surface coating line, installed February 12, 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, with a maximum capacity of 625 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP)

spray guns and dry filters to control particulate overspray, exhausting to stacks S/V22, S/V23, and S/V24, respectively.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a

compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC

1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated upon permit issuance, the Permittee may extend the compliance schedule related to the equipment for ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3; 40 CFR 60, Appendix A; 40 CFR 60, Appendix B; 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 18, 1998.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by

the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Located in Plant 1:

(1) One (1) surface coating line, identified as Line 1, installed January 18, 1991, consisting of:

(A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of 327 parts per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V1 and S/V2; and

(B) Two (2) robot paint booths, installed December 15, 2000, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of 327 parts per hour, each equipped with dry filters to control particulate overspray.

(2) One (1) surface coating line, identified as Line 2, installed January 18, 1991, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) Pursuant to SSM 079-12803-00010, issued on December 15, 2000, the use of VOC on Line 1 (EU1, EU2, EU17, and EU18), including coatings used for plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

(b) Pursuant to T079-7572-00010, issued on September 23, 1998, the use of VOC on Line 2 (EU4 and EU5), including coatings used for plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.1.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of (for clear coats) four and three-tenths (4.3), and (for all other coatings) three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for coatings used on metal parts.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Plant 1 - Line 1 and Plant 1 - Line 2 during cleanup or color changes shall be directed into containers.

Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate Matter (PM) [40 CFR 52, Subpart P]

(a) Pursuant to MSM 079-12803-00010, issued on December 15, 2000, and 40 CFR 52, Subpart P, the PM from the four (4) Line 1 paint booths (EU1, EU2, EU17, and EU18) shall not exceed the pound per hour emission rate established as E in the following formula:

(b) Pursuant to T079-7572-00010, issued on September 23, 1998, and 40 CFR 52, Subpart P, the PM from the two (2) Line 2 paint booths (EU4 and EU5) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.5 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to MSM 079-12803-00010, issued on December 15, 2000, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 1 - Line 1, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Pursuant to T079-7572-00010, issued on September 23, 1998, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 1 - Line 2, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each surface coating line, Line 1 and Line 2, and for the dry filters associated with each line, located in Plant 1.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(a), D.1.1(b), and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V1, S/V2, S/V4, S/V5, S/V17, S/V18a, and S/V18b while one or more of the booths are in operation.

(c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU1, EU2, EU4, EU5, EU17, and EU18) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(a), D.1.1(b), and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1(a), D.1.1(b), and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(b) To document compliance with Conditions D.1.8(a), D.1.8(b), D.1.8(c), and D.1.8(d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Located in Plant 2:

(1) One (1) surface coating line, identified as Line A, installed March 29, 1996, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped with two (2) High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.

(2) One (1) surface coating line, identified as Line B, installed March 29, 1996, consisting of:

(A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and

(B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to CP 079-5091-00010, issued on March 29, 1996, Best Available Control Technology (BACT) shall be considered satisfied provided that:

(a) The total VOC delivered to the applicators of Line A (EU6, EU7, and EU8) and Line B (EU9, EU10, EU11 and EU12) and all cleaning solvents used shall be limited to fifteen (15) tons per month, which is equivalent to one hundred eighty (180) tons per twelve (12) consecutive month period.

(b) The seven (7) spray booths of Line A and Line B shall be equipped with High Volume Low Pressure (HVLP) spray applicators or applicators which deliver equivalent or better transfer efficiency. High Volume Low Pressure application shall be considered achieved provided that the application equipment operates between 0.1 and 10 pounds per square inch (psig) air pressure, measured dynamically at the center of the air cap and at the air horns of the spray system. Any change or modification which may result in an increase in emissions or is in question with the above BACT requirements must be approved by OAQ before such change may occur.

(c) Any solvent sprayed from the applicators in the seven (7) spray booths shall be sprayed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) The conductive copper, silver and black coatings to be applied shall not exceed 6.1 pounds of VOC per gallon of coating, excluding water.

(e) The two (2) 1.0 MMBtu/hr ovens located in Plant 2, identified as 8B and 9B, exhausting to their respective stacks identified as S/V13 and S/V14, shall be used to dry all parts coated by these seven (7) spray booths of Line A and Line B.

D.2.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to T079-7572-00010, issued on September 23, 1998, and 40 CFR 52, Subpart P, PM from the three (3) Line A paint booths (EU6, EU7, and EU8) and the four (4) Line B paint booths (EU9, EU10, EU11, and EU12) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to T079-7572-00010, issued on September 23, 1998, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 2 - Line A and Line B shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each surface coating line, Line A and Line B, and for the dry filters associated with each line, located in Plant 2.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V6, S/V7, S/V8, S/V9, S/V10, S/V11, and S/V12 while one or more of the booths are in operation.

(c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU6, EU7, EU8, EU9, EU10, EU11, and EU12) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent less water used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC usage for each month.

(b) To document compliance with Conditions D.2.6(a), D.2.6(b), D.2.6(c), and D.2.6(d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Located in Plant 3: One (1) surface coating line, identified as Line 3, installed September 27, 1999, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, with a total maximum capacity of 437 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V13, S/V14, and S/V15, respectively.

Located in Plant 4: One (1) surface coating line, identified as Line 4, installed September 5, 2002, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, with a total maximum capacity of 625 parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns, controlled by fabric filters, exhausting to stacks S/V19, S/V20, and S/V21, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, the input VOC to the surface coating Plant 3, Line 3 (EU13, EU14 and EU15) shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

(b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, the input VOC to the surface coating Plant 4, Line 4 (EU19, EU20, and EU21) shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.3.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

(a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 3 - Line 3 paint booths (EU13, EU14, and EU15) shall not exceed the pound per hour emission rate established as E in the following formula:

(b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 4 - Line 4 paint booths (EU19, EU20, and EU21) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

(a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 3 - Line 3 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 4 - Line 4 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each surface coating line, Plant 3, Line 3, and Plant 4, Line 4, and for the dry filters associated with each line.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.3.1(a) and D.3.1(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V13, S/V14, S/V15, S/V19, S/V20, and S/V21 while one or more of the booths are in operation.

(c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU13, EU14, EU15, EU19, EU20, and EU21) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1(a) and D.3.1(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish

compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1(a) and D.3.1(b).

(1) The VOC content of each coating material and solvent less water used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC usage for each month.

(b) To document compliance with Conditions D.3.6(a), D.3.6(b), D.3.6(c), and D.3.6(d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1(a) and D.3.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Located in Plant 5: One (1) surface coating line, installed February 12, 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, with a maximum capacity of 625 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V22, S/V23, and S/V24, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to MSM 079-16570-00010, issued on February 12, 2003, the input VOC to the surface coating line located in Plant 5 (EU22, EU23, and EU24), shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.4.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the three (3) paint booths (EU22, EU23, and EU24) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.4.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) surface coating line and the dry filters located in Plant 5.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V22, S/V23, and S/V24 while one or more of the booths are in operation.

(c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU22, EU23, and EU24) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.4.1.

(1) The VOC content of each coating material and solvent less water used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC usage for each month.

(b) To document compliance with Conditions D.4.6(a), D.4.6(b), D.4.6(c), and D.4.6(d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: Plant 1: Line 1 (EU1, EU2, EU17, and EU18)
Parameter: VOC Input
Limit: 25 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: Plant 1: Line 2 (EU4 and EU5)
Parameter: VOC Input
Limit: 25 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: Plant 2: Line A (EU6, EU7, and EU8) and Line B (EU9, EU10, EU11 and EU12)
Parameter: VOC Input
Limit: 15 tons per month/180 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: Plant 3: Line 3 (EU13, EU14, EU15)
Parameter: VOC Input
Limit: Less than 25 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: Plant 4: Line 4 (EU19, EU20, EU21)
Parameter: VOC Input
Limit: Less than 25 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: One (1) Surface Coating Line located in Plant 5 (EU22, EU23, and EU24)
Parameter: VOC Input
Limit: Less than 25 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ________________________________

Title/Position: ____________________________________

Date: ____

Phone: ____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit Renewal

Source Name:	Erler Industries, Inc.
Source Location:	418 Stockwell Street, North Vernon, Indiana 47265 71 Hayden Pike, North Vernon, Indiana 47265 125 West Hayden Pike, North Vernon, Indiana 47265
County:	Jennings
SIC Code:	3479, 3663
Operation Permit No.:	T079-17195-00010
Permit Reviewer:	Chrystal Wagner

On August 7, 2003, the Office of Air Quality (OAQ) had a notice published in the Plain Dealer and Sun, North Vernon, Indiana, stating that Erler Industries, Inc. had applied for a Part 70 Operating Permit to operate a stationary surface coating operation that spray paints plastic and metal parts. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 5, 2003, Erin I. Surinak, KERAMIDA Environmental, Inc., on behalf of Erler Industries, Inc., submitted comments on the proposed Part 70 permit.

Upon further review, OAQ has made the following revisions to the permit (**bolded** language has been added, ~~struck~~ language has been deleted). The Table of Contents has been modified to reflect these changes.

SECTION B

OAQ has made the following change to Section B. This change is not the result of public comments received during a comment period. OAQ received comments regarding these conditions in other permits and believes that the new conditions more accurately reflect the applicable requirements.

Change B-1:

The provision that is required by 326 IAC 2-7-5(6) has been moved from Condition B.8 to the cover page of the permit. Therefore, Condition B.8 - Compliance with Permit Conditions has been deleted.

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

~~(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

Section D

Comment 1:
Section D.5 and all its conditions should be removed from the permit. Condition D.5.1 establishes a source-wide limit of 250 tons per 12 month period and states that, "Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable." This statement is inaccurate. It is recognized that with the elimination of the plant-wide limit of 250 tons per year, the source would be considered a major source under the PSD regulations.

Response to Comment 1:
OAQ has made this change. This source will be considered major under PSD. Any new construction or modification will be based on a 40 ton per year limit. Condition A.1 has therefore been update. Section D.5 and the accompanying quarterly reporting form have been removed. The Table of Contents has also been updated to include these changes.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates a stationary surface coating operation that spray paints plastic and metal parts.

Responsible Official:	Mark Erler, President
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265 71 Hayden Pike, North Vernon, Indiana 47265 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address:	P.O. Box 219, North Vernon, Indiana 47265
General Source Phone Number:	(812) 346-4421
SIC Code:	3479, 3663
County Location:	Jennings
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program ~~Minor~~ **Major** Source, under PSD Major Source, Section 112 of the Clean Air Act

~~**SECTION D.5 FACILITY OPERATION CONDITIONS**~~

~~**Facility Description [326 IAC 2-7-5(15)]:**~~

~~Plant 1 - Line 1, Plant 1 - Line 2, Plant 2 - Line A and Line B, Plant 3 - Line 3, Plant 4 - Line 4, and Plant 5~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 PSD Minor Limit [326 IAC 2-2]

The total VOC input to all surface coating lines at the source, shall be limited to less than two hundred forty-two (242) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance Determination Requirements

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.3 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.5.1.

(1) The VOC content of each coating material and solvent less water used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC usage for each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T079-17195-00010
Facility: Total Source (All Surface Coating Lines)
Parameter: VOC Input
Limit: Less than 242 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Erler Industries, Inc.**
Source Location:	**418 Stockwell Street, North Vernon, Indiana 47265** **71 Hayden Pike, North Vernon, Indiana 47265** **125 West Hayden Pike, North Vernon, Indiana 47265**
County:	**Jennings**
SIC Code:	**3479, 3663**
Operation Permit No.:	**T079-17195-00010**
Permit Reviewer:	**Chrystal Wagner**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Erler Industries, Inc., relating to a surface coating operation that spray paints plastic and metal parts.

Source Definition

This surface coating company that spray paints plastic and metal parts consists of five (5) plants:

(a) Plant 1 is located at 418 Stockwell Street, North Vernon, Indiana 47265;

(b) Plant 2 is located at 71 Hayden Pike, North Vernon, Indiana 47265;

(c) Plant 3 is located at 125 West Hayden Pike, North Vernon, Indiana 47265;

(d) Plant 4 is located at 125 West Hayden Pike, North Vernon, Indiana 47265; and

(e) Plant 5 is located at 125 West Hayden Pike, North Vernon, Indiana 47265.

Since the five (5) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of Minor Source Modification T079-16570-00010, issued on February 12, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Located in Plant 1:

(1) One (1) paint line, identified as Line 1, installed January 18, 1991, consisting of:

(A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of 327 parts per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V1 and S/V2; and

(B) Two (2) robot paint booths, installed December 15, 2000, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of 327 parts per hour, each equipped with dry filters to control particulate overspray.

(2) One (1) surface coating line, identified as Line 2, installed January 18, 1991, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes High Volume Low Pressure (HVLP), air atomized and electrostatic paint guns.

(b) Located in Plant 2:

(1) One (1) surface coating line, identified as Line A, installed March 29, 1996, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped with two (2) High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.

(2) One (1) surface coating line, identified as Line B, installed March 29, 1996, consisting of:

(A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and

(B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

(c) Located in Plant 3: One (1) surface coating line, identified as Line 3, installed September 27, 1999, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V13, S/V14, and S/V15, respectively.

(d) Located in Plant 4: One (1) surface coating line, identified as Line 4, installed September 5, 2002, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, with a maximum capacity of 625 parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns, controlled by fabric filters, exhausting to stacks S/V19, S/V20, and S/V21, respectively.

(e) Located in Plant 5: One (1) surface coating line, installed February 12, 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, with a maximum capacity of 625 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V22, S/V23, and S/V24, respectively.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr:

(a) Located in Plant 1:
(i) Three (3) 150,000 Btu/hr natural gas space heaters, identified as 1A, 2A, and 5A respectively.
(ii) One (1) 125,000 Btu/hr natural gas space heater, identified as 3A.
(iii) One (1) 75,000 Btu/hr natural gas space heater, identified as 4A.

(b) Located in Plant 2:
(i) Three (3) 250,000 Btu/hr natural gas space heaters, identified as 1B, 2B, and 3B, respectively.

(c) Other:
(i) One (1) 150,000 Btu/hr natural gas space heater, identified as 1C.
(ii) One (1) 125,000 Btu/hr natural gas space heater, identified as 2C.
(iii) One (1) 100,000 Btu/hr natural gas space heater, identified as 3C.

(2) Other activities or categories not previously identified:

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A and 7A, exhausting to stacks S/V15 and S/V16, respectively; two (2) 1.0 MMBtu/hr ovens located in Plant 2, identified as 8B and 9B, exhausting to stacks S/V13 and S/V14, respectively.

(b) Two (2) 1.2 MMBtu/hr natural gas fired ovens located in Plant 3, identified as Oven 1 and Oven 2, exhausting to stacks S/V3-1 and S/V3-2, respectively

(c) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven IR-3 and Oven IR4.

(d) Three (3) infra-red (IR) ovens, located in Plant 5, identified as Oven IR-7, Oven IR-8, and Oven IR-9.

(e) One (1) ultraviolet (UV) oven, located in Plant 5, identified as UV1.

(f) One (1) ultraviolet (UV) oven, located in Plant 3, identified as UV2.

(g) Three (3) mask washers using detergent and hot water, located in Plant 2, identified as 4B, 5B, and 6B.

(h) One (1) mask washer using MEK, located in Plant 2, identified as 7B.

(i) One (1) parts washer using a phosphate solution, located in Plant 1, identified as 8A.

(j) One (1) air make-up unit rated at 6.0 MMBtu/hr, located in Plant 3, identified as AM1.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Minor Permit Modification T079-16961-00010, issued on March 19, 2003;

(b) Minor Source Modification T079-16570-00010, issued on February 12, 2003;

(c) Minor Permit Modification T079-16437-00010, issued on October 16, 2002;

(d) Minor Source Modification T079-16237-00010, issued on September 5, 2002;

(e) Reopen Part 70 Operating Permit T079-13341-00010, issued on February 7, 2002;

(f) Minor Permit Modification T079-12808-00010, issued on January 12, 2001;

(g) Minor Source Modification T079-12803-00010, issued on December 15, 2000;

(h) Administrative Amendment T079-11173-00010, issued on September 27, 1999;

(i) Significant Source Modification T079-11008-00010, issued on September 27, 1999;

(j) Administrative Amendment T079-10586-00010, issued on August 20, 1999; and

(k) Part 70 Operating Permit T079-7572-00010, issued on September 23, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) Part 70 Operating Permit T079-7572-00010, issued on September 23, 1998

Condition D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
Pursuant to CP No. 079-5091-00010, issued on March 29, 1996, the input VOCs to Plant 2 (Line A and Line B) is limited to 15 tons per month (180 tons per year) of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit and Condition D.2.1 makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Reason not incorporated: The source-wide VOC PTE is limited to less than two hundred fifty (250) tons per year. This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, 326 IAC 2-2 is not applicable. This eliminates the need for an additional PSD limit on the Plant 2 surface coating lines.

(b) Part 70 Operating Permit T079-7572-00010, issued on September 23, 1998

Section D.3: Facility Operation Conditions, Insignificant Activities:

Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 MMBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
The PM from the two (2) 100,000 Btu/hr natural gas fired ovens, identified as 6A and 7A, and the two (2) IR ovens, identified as 9A and 10A, located in Plant 1, and those facilities listed in Condition D.1.4, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.0 MMBtu/hr ovens, identified as 8B and 9B, located in Plant 2, and those facilities listed in Condition D.2.3, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Reason not incorporated: 326 IAC 6-3 does not apply to these insignificant activities. This rule applies to manufacturing processes that generate particulate emissions. Pursuant to 326 IAC 6-3-1.5, a manufacturing process is “any single or series of actions, operations or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product.” Particulate is not emitted from the curing process. Particulate is a result of the combustion of natural gas, and not a result of any change to the material being processed. Therefore, Section D.3 has been removed.

(c) Minor Source Modification T079-16570-00010, issued on February 12, 2003

Condition D.5.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]
Any change or modification that increases the potential to emit of any single HAP from the one (1) paint line, located in Plant 5, to greater than ten (10) tons per year or increases the potential to emit of any combination of HAPs from the one (1) paint line, located in Plant 5, to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 2-4.1-1 applicable and require prior IDEM, OAQ approval.

Reason not incorporated: The unrestricted potential to emit for any single HAP from the Plant 5 surface coating line is less than ten (10) tons per year and less than twenty-five (25) tons per year for any combination of HAP. There is also a limit on the amount of VOC input to the surface coating line, thereby further limiting potential HAP emissions.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 17, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A, pages 1 through 12 of this document.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions.

Pollutant	Potential To Emit (tons/year)
PM	166.2
PM-10	166.2
SO_2	-
VOC	657.87
CO	-
NO_x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Xylene	63.89
MIK	14.12
MEK	256.01
Ethylbenzene	6.05
Glycol ethers	37.49
Toluene	0.82
Methanol	54.14
TOTAL	432.52

(a) The unrestricted potential emissions of volatile organic compounds (VOC) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	1
SO_2	0
VOC	129
CO	0
NO_x	0
HAP (specify)	-

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Total Emissions (Source-wide limit)				249.0			

County Attainment Status

The source is located in Jennings County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart TTT (Surface Coating of Plastic Parts for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines). This source spray coats metal and plastic parts under Standard Industrial Classification (SIC) Codes 3479 and 3663. These SIC codes are not categories for the surface coating of plastic

parts that cover business machines. Therefore, the requirements of 40 CFR 60, Subpart TTT are not applicable.

(b) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAP (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAP) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.

(2) The Permittee submitted a Part 1 MACT Application on May 1, 2002.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

(A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

(c) The one (1) mask washer using MEK, located in Plant 2, identified as 7B, the three (3) mask washers using detergent and hot water, located in Plant 2, identified as 4B, 5B, and 6B, and the one (1) parts washer using a phosphate solution, located in Plant 1, identified as 8A, listed under insignificant activities are not subject to 40 CFR 63, Subpart T (National Emissions Standards for Halogenated Solvent Cleaning) because they do not use halogenated solvents.

(d) The surface coating lines have no applicable compliance assurance monitoring (CAM) requirements pursuant to 40 CFR 64.1. CAM does not apply to the surface coating lines

because each has an uncontrolled PTE for particulate matter that is less than 100 tons per year.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a minor source because the potential source-wide VOC emissions are limited to less than 250 tons per twelve (12) consecutive month period. The surface coating operations have been limited to less than two hundred forty-two (242) tons per twelve (12) consecutive month period. Potential VOC emissions from insignificant activities are estimated to be eight (8) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) will not apply. This source was constructed January 18, 1991. This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), this rule applies to any owner or operator who constructs or reconstructs a major source of HAP, as defined in 40 CFR 63.41, after July 27, 1997. This rule does not apply to an owner or operator that has received all necessary permits for the construction or reconstruction before Jule 27, 1997. The production units installed before July 27, 1997 had all necessary permits. The production units installed after July 27, 1997 are not considered “constructed major sources,” as defined in 40 CFR 63.41. Therefore, the requirements of 326 IAC 2.4.1-1 are not applicable.

Any change or modification that increases the potential to emit of any single HAP to greater than ten (10) tons per year, or the potential to emit of any combination of HAP to greater than twenty-five (25) tons per year, may render the requirements of 326 IAC 2-4.1-1 applicable and require prior IDEM, OAQ approval.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by U.S. EPA into the Indiana State Implementation Plan (SIP). Therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the

SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Plant 1 - Line 1
Pursuant to MSM 079-12803-00010, issued on December 15, 2000, and 40 CFR 52, Subpart P, the PM from the four (4) Line 1 paint booths (EU1, EU2, EU17, and EU18) shall not exceed the pound per hour emission rate established as E in the following formula:

Plant 1 - Line 2
Pursuant to T079-7572-00010, issued on September 23, 1998, and 40 CFR 52, Subpart P, the PM from the two (2) Line 2 paint booths (EU4 and EU5) shall not exceed the pound per hour emission rate established as E in the following formula:

Plant 2 - Line A and Line B
Pursuant to T079-7572-00010, issued on September 23, 1998, and 40 CFR 52, Subpart P, PM from the three (3) Line A paint booths (EU6, EU7, and EU8) and the four (4) Line B paint booths (EU9, EU10, EU11, and EU12) shall not exceed the pound per hour emission rate established as E in the following formula:

Plant 3 - Line 3
Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 3, Line 3 paint booths (EU13, EU14, and EU15) shall not exceed the pound per hour emission rate established as E in the following formula:

Plant 4 - Line 4
Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 4, Line 4 paint booths (EU19, EU20, and EU21) shall not exceed the pound per hour emission rate established as E in the following formula:

Plant 5
Pursuant to MSM 079-16570-00010, issued on February 12, 2003, and 40 CFR 52, Subpart P, the PM from the three (3) paint booths (EU22, EU23, and EU24) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the spray coating is in operation, in order to comply with this limit.

326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
Under the rule revision, pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
Plant 1 - Line 1
Pursuant to SSM 079-12803-00010, issued on December 15, 2000, the use of VOC on Line 1 (EU1, EU2, EU17, and EU18), including coatings that coat plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable. 326 IAC 8-1-6 applies to all coatings used for surface coating plastic parts on Plant 1 - Line 1. Coatings used for surface coating metal parts on Line 1 - Plant 1 are subject to the requirements of 326 IAC 8-2-9.

Plant 1 - Line 2
Pursuant to T079-7572-00010, issued on September 23, 1998, the use of VOC on Line 2 (EU4 and EU5), including coatings that coat plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable. 326 IAC 8-1-6 applies to all coatings used for surface coating plastic parts on Plant 1 - Line 2. Coatings used for surface coating metal parts on Line 1 - Plant 2 are subject to the requirements of 326 IAC 8-2-9.

Plant 2 - Line A and Line B
Pursuant to CP 079-5091-00010, issued on March 29, 1996, Best Available Control Technology (BACT) shall be considered satisfied provided that:

(a) The total VOC delivered to the applicators of Line A (EU6, EU7, and EU8) and Line B (EU9, EU10, EU11 and EU12) and all cleaning solvents used shall be limited to fifteen (15) tons per month, which is equivalent to one hundred eighty (180) tons per twelve (12) consecutive month period.

(b) The seven (7) spray booths of Line A and Line B shall be equipped with High Volume Low Pressure (HVLP) spray applicators or applicators which deliver equivalent or better transfer efficiency. High Volume Low Pressure application shall be considered achieved provided that the application equipment operates between 0.1 and 10 pounds per square inch (psig) air pressure, measured dynamically at the center of the air cap and at the air horns of the spray system. Any change or modification which may result in an increase in emissions or is in question with the above BACT requirements must be approved by OAQ before such change may occur.

(c) Any solvent sprayed from the applicators in the seven (7) spray booths shall be sprayed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) The conductive copper, silver and black coatings to be applied shall not exceed 6.1 pounds of VOC per gallon of coating, excluding water.

(e) The two (2) 1.0 MMBtu/hr ovens located in Plant 2, identified as 8B and 9B, exhausting to their respective stacks identified as S/V13 and S/V14, shall be used to dry all parts coated by these seven (7) spray booths of Line A and Line B.

Plant 3 - Line 3
Pursuant to SSM 079-11008-00010, issued on September 27, 1999, the input VOC to the surface coating Plant 3, Line 3 (EU13, EU14 and EU15) shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

Plant 4 - Line 4
Pursuant to MSM 079-16237-00010, issued on September 5, 2002, the input VOC to the surface coating Plant 4, Line 4 (EU19, EU20, and EU21) shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

Plant 5
Pursuant to MSM 079-16570-00010, issued on February 12, 2003, the input VOC to the surface coating line located in Plant 5 (EU22, EU23, and EU24), shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12)

consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The surface coating at Plant 1 - Line 1 and Plant 1 - Line 2 is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating) because they were each constructed after July 1, 1990, and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Plant 1 - Line 1 and Plant 1 - Line 2 spray coat both metal and plastic parts. Coating information and amounts used on metal parts will be used to determine compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the owner or operator shall not emit VOC in excess of the following:

(a) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings to metal parts.

(b) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies all other coatings to metal parts.

(c) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The surface coating at Plant 2 - Line A and Line B, Plant 3 - Line 3, Plant 4 - Line 4, and Plant 5 spray coat plastic parts only. Therefore, 326 IAC 8-2-9 is not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The three (3) mask washers using detergent and hot water, located in Plant 2, identified as 4B, 5B, and 6B, and the one (1) parts washer using a phosphate solution, located in Plant 1, identified as 8A, are not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations) because they do not use VOC-containing products.

The one (1) mask washer using MEK, located in Plant 2, identified as 7B, is not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations) because it has a potential to emit that is less than fifteen (15) pounds VOC per day.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Each surface coating line has applicable monitoring as specified below:

(a) Daily inspections to verify the placement, integrity and particle loading of the filters.

(b) Weekly observations shall be performed of the overspray from the surface coating booth stacks while the booth is in operation.

(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary because to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this surface coating facility that spray paints plastic and metal parts shall be subject to the conditions of the attached proposed **Part 70 Permit No. T079-17195-00010**.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: T079-17195-00010
Plt ID: 079-00010
Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 1 - Line 1 (EU1, EU2, EU17, EU18)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU1 and EU2																
Clear Coat ACL-L77	8.5	62.93%	0.0%	62.9%	0.0%	28.58%	0.00200	327.000	5.35	5.35	3.50	83.96	15.32	4.96	18.72	45%
Base Coat AML-L9	8.0	76.99%	0.0%	77.0%	0.0%	17.74%	0.00250	327.000	6.16	6.16	5.04	120.84	22.05	3.63	34.72	45%
EU17 and EU18																
Clear Coat ACL-L77	8.5	62.93%	0.0%	62.9%	0.0%	28.58%	0.00200	327.000	5.35	5.35	3.50	83.96	15.32	4.96	18.72	45%
Base Coat AML-L9	8.0	76.99%	0.0%	77.0%	0.0%	17.74%	0.00250	327.000	6.16	6.16	5.04	120.84	22.05	3.63	34.72	45%
State Potential Emissions			**Add worst case coating to all solvents**								**17.07**	**409.60**	**74.75**	**17.18**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP #: T079-17195-00010
Plt ID: 079-00010
Permit Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 1 - Line 1 (EU1, EU2, EU17, EU18)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
EU1 and EU2							
Clear Coat ACL-L77	8.50	0.00200	327.00	1.58%	20.00%	0.38	4.87
Base Coat AML-L9	8.00	0.00250	327.00	4.49%	0.00%	1.29	0.00
EU17 and EU18							
Clear Coat ACL-L77	8.50	0.00200	327.00	1.58%	20.00%	0.38	4.87
Base Coat AML-L9	8.00	0.00250	327.00	4.49%	0.00%	1.29	0.00
						3.34	**9.74**
METHODOLOGY						**TOTAL HAP:**	**13.08**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: T079-17195-00010
Plt ID: 079-00010
Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 1 - Line 2 (EU4 and EU5)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Black lacquer AE169-18526	7.6	68.80%	0.0%	68.8%	0.0%	23.60%	0.00110	450.000	5.24	5.24	2.60	62.28	11.37	2.83	22.21	45%
State Potential Emissions			**Add worst case coating to all solvents**								**2.60**	**62.28**	**11.37**	**2.83**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP #: T079-17195-00010
Plt ID: 079-00010
Permit Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 1 - Line 2 (EU4 and EU5)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MIK	Weight % Toluene	Weight % Xylene	MIK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)
Black lacquer AE169-18526	7.60	0.001100	450.00	20.00%	5.00%	5.00%	3.30	0.82	0.82
Total State Potential Emissions							**3.30**	**0.82**	**0.82**

METHODOLOGY **TOTAL HAP: 4.94**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: T079-17195-00010
Plt ID: 079-00010
Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 2 - Line A and Line B

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line A																
Conductive Copper	8.7	70.00%	0.0%	70.0%	0.0%	11.00%	0.05000	80.000	6.09	6.09	24.36	584.64	106.70	25.15	55.36	45%
Conductive Silver	10.8	56.00%	1.6%	54.4%	1.8%	12.00%	0.03125	80.000	5.98	5.88	14.69	352.51	64.33	28.62	48.96	45%
Conductive Black	7.6	73.00%	0.0%	73.0%	0.0%	12.00%	0.02500	80.000	5.55	5.55	11.10	266.30	48.60	9.89	46.23	45%
MEK to clean equipment	6.7	100.00%	0.3%	99.8%	0.0%	0.00%	0.14881	1.000	6.68	6.68	0.99	23.87	4.36	0.00	ERR	45%
Isopropanol to clean painted parts	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.11905	1.000	6.50	6.50	0.77	18.57	3.39	0.00	ERR	45%
Line B																
Conductive Copper	8.7	70.00%	0.0%	70.0%	0.0%	11.00%	0.05000	80.000	6.09	6.09	24.36	584.64	106.70	25.15	55.36	45%
Conductive Silver	10.8	56.00%	1.6%	54.4%	1.8%	12.00%	0.03125	80.000	5.98	5.88	14.69	352.51	64.33	28.62	48.96	45%
Conductive Black	7.6	73.00%	0.0%	73.0%	0.0%	12.00%	0.02500	80.000	5.55	5.55	11.10	266.30	48.60	9.89	46.23	45%
MEK to clean equipment	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.14881	1.000	6.70	6.70	1.00	23.93	4.37	0.00	ERR	45%
Isopropanol to clean painted parts	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.11905	1.000	6.50	6.50	0.77	18.57	3.39	0.00	ERR	45%

State Potential Emissions **Add worst case coating to all solvents** **103.83** **2491.85** **454.76** **127.31**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP #: T079-17195-00010
Plt ID: 079-00010
Permit Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 2 - Line A and Line B

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % Methanol	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)
Line A													
Conductive Copper	8.70	0.050000	80.00	50.00%	0.00%	0.00%	0.00%	10.00%	76.21	0.00	0.00	0.00	15.24
Conductive Silver	10.80	0.031250	80.00	0.00%	10.00%	10.00%	0.00%	10.00%	0.00	11.83	11.83	0.00	11.83
Conductive Black	7.60	0.025000	80.00	71.25%	10.75%	0.00%	0.45%	0.00%	47.44	7.16	0.00	0.30	0.00
MEK to clean equipment	6.70	0.148810	1.00	99.80%	0.00%	0.00%	0.00%	0.00%	4.36	0.00	0.00	0.00	0.00
Line B													
Conductive Copper	8.70	0.050000	80.00	50.00%	0.00%	0.00%	0.00%	10.00%	76.21	0.00	0.00	0.00	15.24
Conductive Silver	10.80	0.031250	80.00	0.00%	10.00%	10.00%	0.00%	10.00%	0.00	11.83	11.83	0.00	11.83
Conductive Black	7.60	0.025000	80.00	71.25%	10.75%	0.00%	0.45%	0.00%	47.44	7.16	0.00	0.30	0.00
MEK to clean equipment	6.70	0.148810	1.00	99.80%	0.00%	0.00%	0.00%	0.00%	4.36	0.00	0.00	0.00	0.00
Total State Potential Emissions									**256.01**	**37.97**	**23.65**	**0.60**	**54.14**

METHODOLOGY **TOTAL HAP: 372.37**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: T079-17195-00010
Plt ID: 079-00010
Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 3 - Line 3 (EU13, EU14, and EU15)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Clear Coat XPC60014 and Hardner XPH80002, as applied (7:2 mix)	8.3	59.60%	0.0%	59.6%	0.0%	33.56%	0.00170	437.000	4.95	4.95	3.68	88.31	16.12	2.73	14.76	75%
Light Titanium Gray XPB20003 and Reducing Solvent XPS90013, as applied (1:1 mix)*	7.6	87.10%	0.0%	87.1%	0.0%	8.75%	0.00250	437.000	6.62	6.62	7.23	173.57	31.68	1.17	75.65	75%
*represents worst-case scenario																
State Potential Emissions			**Add worst case coating to all solvents**								**10.91**	**261.87**	**47.79**	**3.90**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP #: T079-17195-00010
Plt ID: 079-00010
Permit Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 3 - Line 3 (EU13, EU14, and EU15)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % MIK	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIK Emissions (ton/yr)
Clear Coat XPC60014 and Hardner XPH80002, as applied (7:2 mix)	8.31	0.001700	437.00	20.00%	0.00%	5.00%	0.00%	5.41	0.00	1.35	0.00
Light Titanium Gray XPB20003 and Reducing Solvent XPS90013, as applied (1:1 mix)*	7.60	0.002500	437.00	10.53%	2.63%	2.63%	23.69%	3.83	0.96	0.96	8.62

*represents worst-case scenario

Total State Potential Emissions	**9.24**	**0.96**	**2.31**	**8.62**
METHODOLOGY	**TOTAL HAP:**	**21.12**		

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: T079-17195-00010
Plt ID: 079-00010
Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 4 - Line 4 (EU19, EU20, and EU21)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Base Coat XPB20003	8.00	75.50%	0.0%	75.50%	0.0%	17.50%	0.00143	625.0	6.04	6.04	5.40	129.56	23.64	3.07	34.51	60%
Clear Coat UV Gloss XPC70015	8.04	49.78%	0.0%	49.78%	0.0%	50.00%	0.00100	625.0	4.00	4.00	2.50	60.03	10.96	4.42	8.00	60%
State Potential Emissions			**Add worst case coating to all solvents**								**7.90**	**189.59**	**34.60**	**7.49**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP #: T079-17195-00010
Plt ID: 079-00010
Permit Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 4 - Line 4 (EU19, EU20, and EU21)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIK	Weight % Ethylbenzene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	MIK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Base Coat XPB20003	8.00	0.00143	625.0	20.00%	0.00%	5.00%	5.00%	6.26	0.00	1.57	1.57
Clear Coat UV Gloss XPC70015	8.04	0.00100	625.0	0.00%	5.00%	0.00%	0.00%	0.00	1.10	0.00	0.00
								6.26	**1.10**	**1.57**	**1.57**

Total State Potential Emissions

TOTAL HAP: 10.50 ton/yr

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: T079-17195-00010
Plt ID: 079-00010
Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 5 - Paint Booths EU22, EU23, EU24

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Base Coat XPB20003	8.00	75.50%	0.0%	75.50%	0.0%	17.50%	0.00143	625.0	6.04	6.04	5.40	129.56	23.64	3.07	34.51	60%
Clear Coat UV Gloss XPC70015	8.04	49.78%	0.0%	49.78%	0.0%	50.00%	0.00100	625.0	4.00	4.00	2.50	60.03	10.96	4.42	8.00	60%
State Potential Emissions			**Add worst case coating to all solvents**								**7.90**	**189.59**	**34.60**	**7.49**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP #: T079-17195-00010
Plt ID: 079-00010
Permit Reviewer: Chrystal Wagner
Date: July 14, 2003

Plant 5 - Paint Booths EU22, EU23, EU24

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIK	Weight % Ethylbenzene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	MIK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Base Coat XPB20003	8.00	0.00143	625.00	20.00%	0.00%	5.00%	5.00%	6.26	0.00	1.57	1.57
Clear Coat UV Gloss XPC7001	8.04	0.00100	625.00	0.00%	5.00%	0.00%	0.00%	0.00	1.10	0.00	0.00
								6.26	**1.10**	**1.57**	**1.57**

Total State Potential Emissions

TOTAL HAP: 10.50 ton/yr

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs